

**REMARKS**

The indication of allowable subject matter in claims 14-16 is acknowledged and appreciated. Accordingly, each of claims 14-16 have been rewritten into independent form so as to be in condition for allowance. In view of the following remarks, it is respectfully submitted that all claims are in condition for allowance.

Claims 7, 9, 12, 17 and 20 are independent and stand rejected under 35 U.S.C. § 103 as being unpatentable over Mahmud 1 in view of Amadori. This rejection is respectfully traversed for the following reasons.

The Examiner notes that “none of the recommendations cited in the interview summary ... were implemented.” However, from the interview, Applicant and Applicant’s representative had the impression that an agreement was made with Examiner Ferris (Primary Examiner who sat in with Examiner Sharon) and Examiner Sharon that the necessary distinctions between the present invention and cited prior art were already sufficiently defined in the pending claims. In this regard, the Examiners requested that Applicant file arguments which would clarify the interpretation of the claims so as to evidence precisely how the aforementioned distinctions were set forth in the language of the claims.

Nonetheless, in order to further clarify the distinction between the present invention and cited prior art whereby large scale networks are not a subject of the present invention, the independent claims have been amended *as suggested in the Interview Summary* to embody a method of designing an interface of a *semiconductor integrated circuit* which executes *plural* applications.

As shown in Fig. 7 of Applicant's drawings and described in the corresponding description, the present invention can analyze a performance of an interface through operation simulation arranged on a processing time base. That is, the designing method of the present invention can operate *actual* simulation such that applications are operated along a time sequence and the performance of an interface is evaluated time-by-time (see Fig. 7). It should be noted that each of the applications relates to a specific function as recited in independent claims 7, 9, 12, 17 and 20, with exemplary functions described, for example, in Fig. 6 and page 17, line 22 - page 18, line 9 of Applicant's specification.

Turning to the cited prior art, Mahmud\_1 is merely a theoretical paper. The disclosed "theoretical" simulation only uses probability and a predetermined period as a variation value. After the predetermined period has passed, the disclosed process simply calculates the bandwidth. Accordingly, Mahmud\_1 fails to disclose or suggest an operation simulation such that applications which relate to specific functions are operated sequentially along a time sequence.

Furthermore, Mahmud\_1 is completely silent as to plural applications where each of the plural applications relates to a specific function (again, Mahmud\_1 only uses probabilities and a whole predetermined period). In this regard, Amadori also is completely silent as to time sequential operation simulation and therefore does not obviate the deficiencies of Mahmud\_1.

Accordingly, even assuming *arguendo* proper, the proposed combination does not disclose or suggest the claimed invention. The Examiner is directed to MPEP § 2143.03 under the section entitled "All Claim Limitations Must Be Taught or Suggested", which sets forth the applicable standard:

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

In the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" as recited in claims 7, 9, 12, 17 and 20 because the proposed combination fails the "all the claim limitations" standard required under § 103.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claims 7, 9, 12, 17 and 20 are patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on all the foregoing, it is submitted that claims 7-27 are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejections under 35 U.S.C. § 103 be withdrawn.

### CONCLUSION

Having fully and completely responded to the Office Action, Applicant submits that all of the claims are now in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicant's attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

MCDERMOTT, WILL & EMERY



Ramyar M. Farid  
Registration No. 46,692

600 13<sup>th</sup> Street, N.W.  
Washington, DC 20005-3096  
(202) 756-8000 RMF:rrh  
Facsimile: (202) 756-8087  
**Date: October 8, 2004**